



Application GRANTED. The conference is adjourned from February 17 to April 14, 2021 at 2:30 p.m. in Courtroom 11D. The Conference will serve as both a pre-motion conference (if one is needed) and an initial conference.
SO ORDERED.

February 1, 2021

A handwritten signature in black ink, reading "P. Kevin Castel".

P. Kevin Castel
United States District Judge

BY ECF

Honorable P. Kevin Castel, U.S.D.J. 2/2/2021
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Re: *Kamara v. Pepperidge Farm, Inc.*, Case No. 1:20-cv-09012-PKC

Judge Castel:

We write on behalf of defendant Pepperidge Farm, Incorporated (“Pepperidge Farm”). In accordance with your Honor’s Individual Practices, Pepperidge Farm requests an adjournment of the initial conference, which is currently set for February 19, 2021, and an adjournment of the deadline for submission of the civil case management plan and scheduling order, which is currently due on February 17, 2021.

Pepperidge Farm’s response to plaintiff’s complaint is due on March 22, 2021 – over a month after the date on which the initial conference is scheduled. On or before its deadline to answer or otherwise respond to the complaint, Pepperidge Farm anticipates that it will request a pre-motion-to-dismiss conference with the Court. It is possible, if not likely, that plaintiff will respond to Pepperidge Farm’s request by amending the complaint. Accordingly, in the interest of judicial economy and preserving the Court’s limited resources, Pepperidge Farm believes that the initial conference should occur after the conclusion of the pre-motion conference, once the parties have additional clarity as to the pleadings in this case.¹ Thus, Pepperidge Farm respectfully requests that the initial conference be adjourned until April 16, 2021, with submission of the civil case management plan and scheduling order by April 9, 2021.

On December 29, 2020, plaintiff requested to adjourn the original initial conference in this case. On December 30, 2020, the Court granted the request, and adjourned the conference from January 7, 2021 to February 19, 2021. Plaintiff consents to this request.

Sincerely,
/s/ Dale J. Giali, admitted pro hac vice

¹ This request is based, in part, on the Court’s Individual Practices, which imply that the initial conference should be held after a defendant’s response to the complaint is due (*see, e.g.*, Individual Rule 1(B) (stating that a request for an adjournment of time to answer a complaint “should include a request to adjourn the initial conference to a date at least 14 days after the answer would be due.”)).